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March 13, 2020

Judge Colleen McMahon
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: United States v. Calvin Hudson, 19 CR 496 (CM)

Your Honor,

MEMO ENDORSED

3/13/2020

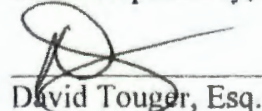
Motion to be released on
bail is denied. WE can
discuss the matter at
the conference scheduled
for Wednesday (3/18) at 2 PM.

Colleen McMahon

In response to the defendant's recent bail motion the Court ruled it would reconsider it's denial of bail if the closure of the MCC to visits continued. Although shortly after the Court's ruling the MCC did in fact reopen for visits¹ it has now been decided that all federal prisons will be shutdown for visits for 30 days. Thus, I am respectfully renewing the defense motion for bail at this time. A complete cessation of visits at this critical time of preparation would make it impossible to adequately prepare for trial especially considering the new charges and Discovery that occurred just prior to the shutdown of visits.

Thank you very much for your consideration of this matter. At our upcoming conference on Wednesday, March 18th counsel would of course be ready to discuss this issue further.

Most Respectfully,


David Touger, Esq.

cc: All Government Counsel

¹ Counsel tried in vain to visit Mr. Hudson on Tuesday but was able to visit Mr. Hudson on Wednesday. The MCC was shutdown again for visits on Thursday.